

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0844-XR
	§	
GREGORY ABBOTT, et al.	§	
<i>Defendants.</i>	§	

OCA-GREATER HOUSTON, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	1:21-CV-0780-XR
	§	
JOSE A. ESPARZA, et al.	§	
<i>Defendants.</i>	§	

HOUSTON JUSTICE, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0848-XR
	§	
GREGORY WAYNE ABBOTT, et al.,	§	
<i>Defendants.</i>	§	

TEXAS LULAC, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	1:21-CV-0786-XR
	§	
JOSE ESPARZA, et al.,	§	
<i>Defendants.</i>	§	

MI FAMILIA VOTA, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0920-XR
	§	
GREG ABBOTT, et al.,	§	
<i>Defendants.</i>	§	

**DEFENDANT DANA DEBEAUVOIR’S NOTICE OF JOINDER IN OPPOSITION TO
INTERVENTION**

Defendant Dana DeBeauvoir, in her official capacity as Travis County Clerk, hereby joins in the Opposition to the Public Interest Legal Foundation’s (hereinafter, “PILF”) Motion to Intervene filed by Defendants Jacquelyn Callanen,¹ Yvonne Ramón,² Michael Scarpello,³ and Lisa Wise,⁴ in their official capacities (hereinafter referred to in this Notice as the “County Election Administrator Defendants”), (ECF No. 52).

While the putative intervenor (“PILF”) only expressly sought to intervene in the LULAC Texas Plaintiffs’ action, PILF nevertheless purports to reserve the right to respond and seek to intervene with respect to each of the consolidated cases pursuant to footnote 1 of its Motion to Intervene.⁵ To the extent that PILF seeks to intervene in the LULAC Texas and OCA-Greater Houston Plaintiffs’ consolidated actions in which Defendant DeBeauvoir has been sued and appeared as a defendant, PILF’s Motion should be denied for the reasons and authorities set forth in the *County Election Administrator Defendants’ Opposition*,⁶ Defendant DeBeauvoir incorporates by reference the reasons and authorities set forth in the *County Election Administrator Defendants’ Opposition* as though same were set forth in full herein.

¹ Sued in her official capacity as Bexar County Elections Administrator.

² Sued in her official capacity as Hidalgo County Elections Administrator.

³ Sued in his official capacity as Dallas County Elections Administrator.

⁴ Sued in her official capacity as El Paso County Elections Administrator.

⁵ See, ECF No. 43, Public Interest Legal Foundation’s Motion to Intervene at 2, fn. 1.

⁶ See, ECF No. 52.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT DANA
DEBEAUVOIR, IN HER OFFICIAL
CAPACITY AS TRAVIS COUNTY CLERK**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this motion was served through the Court's CM/ECF Document Filing System upon each attorney of record and the original upon the Clerk of Court on this the 27th day of October, 2021.

/s/ Anthony J. Nelson

ANTHONY J. NELSON

PATRICK T. POPE

Assistant County Attorneys